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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL EDISON,)
a/k/a Michael J. Edison, and)
DEBRA EDISON,)
a/k/a Debra Legum-Edison,)
a/k/a Debra Sue Legum-Edison,)
Defendants.)

Criminal No. CR 07-0074 WHA

**STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on March 26, 2008. The defendant, DEBRA EDISON, was represented by Eric Hairston, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. A pretrial motions briefing schedule and trial date were set with the defendant's motions due to be filed on April 22, 2008. The previously set appearance on June 3, 2008 was vacated.

STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME
CR 07-0074 WHA

1 The Court made a finding that the time from and including March 26, 2008, through and
 2 including April 22, 2008, should be excluded under the Speedy Trial Act, 18 U.S.C.
 3 § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best
 4 interest of the public and the defendant in a speedy trial. The finding was based on the need for
 5 the defendant to have reasonable time necessary for effective preparation and for continuity of
 6 counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

7 The parties hereby agree to and request that the exclusion of time until April 22, 2008, be
 8 granted. The parties agree and stipulate that the additional time is appropriate and necessary
 9 under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this
 10 continuance outweigh the best interest of the public and the defendant in a speedy trial. This
 11 time exclusion will allow defense counsel to effectively prepare, taking into account the exercise
 12 of due diligence, and will provide for continuity of counsel for the defendant.

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 14
 15 DATED: March 27, 2008

/s/
 ERIC HAIRSTON
 Counsel for Debra Edison

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 17
 18 DATED: March 27, 2008

/s/
 JEFFREY R. FINKELMAN
 Assistant U.S. Attorney

19
 20
 21 So ordered.

22 DATED: March 27, 2008.

23 WILLIAM H. ALSUP
 UNITED STATES DISTRICT COURT JUDGE

